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Federal Defenders OF NEW YORK, INC.

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February 6, 2024

## **VIA ECF**

Honorable Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. Jimmy Solano-Arias</u> 23 Cr. 275 (PGG)

Dear Judge Gardephe,

I write to respectfully request that the Court modify Mr. Solano's bail package, to remove the conditions of curfew and location monitoring. Pursuant to the Bail Reform Act, Mr. Solano should be subject to the least restrictive conditions necessary. See 18 U.S.C. § 3142(c).

Pretrial Services (PTS) by Officer Courtney DeFeo reached out to undersigned counsel at the beginning of January to say that PTS supported removing Mr. Solano's ankle monitor and placing him on supervision as directed by PTS. Officer DeFeo explained that Mr. Solano had been wearing the bracelet for more than 8 months and has remained in full compliance since the start of supervision. Officer DeFeo is now on leave and Officer Steven Boose has taken over Mr. Solano's supervision. He confirmed with me on Friday that PTS continues to support this modification application.

The government, by A.U.S.A. Mitzi Steiner, defers to Pretrial's position regarding this request.

Thank you for your consideration.

Respectfully submitted, /s/
Sylvie Levine
Attorney for Mr. Solano 212-417-8729

**MEMO ENDORSED** 

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J. Dated: February 7, 2024